

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

TRISTAN SCHULTIS, M.D. * CIVIL ACTION
*
versus * CASE NO. 1:08cv00083 LMB
*
ADVANCED HEALTHCARE MANAGEMENT *
SERVICES, LLC *
*

AMENDED AND SUPPLEMENTAL COMPLAINT
FOR DECLARATORY JUDGMENT, DAMAGES AND OTHER EQUITABLE RELIEF

AND NOW INTO COURT, through undersigned counsel, comes Tristan Schultis, M.D. ("Dr. Schultis") and amends and supplements his original Complaint for Declaratory Judgment, Damages and Other Equitable Relief filed on June 3, 2008, in the following particulars:

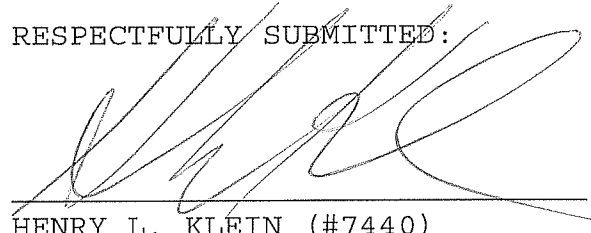
1. To restate, as if written out herein fully and in
extenso, all of the allegations of fact set forth in the Original
Complaint.

2. To state, as a specific and separate cause of action, Dr. Schultis' rights to compensatory and exemplary damages for violations of the agreement executed by and between Dr. Schultis and Advanced Healthcare Management Services, LLC ("Advanced Healthcare") dated February 10, 2006, as follows:

- (a) Advanced Healthcare's failure to pay Dr. Schultis timely and in the appropriate amounts due;
- (b) Advanced Healthcare's failure to pay wages timely and in the appropriate amounts, subjecting Advanced Healthcare to statutory penalties for the failure to pay Dr. Schultis as a wage-earning employee;
- (c) Advanced Healthcare's breach of duty of good faith in connection with all aspects of the relationship between Dr. Schultis and Advanced Healthcare;
- (d) Advanced Healthcare's wrongful infliction of emotional and other related non-pecuniary damages throughout the term of the relationship between Dr. Schultis and Advanced Healthcare, and its aftermath;
- (e) Advanced Healthcare's failure and/or refusal to negotiate in good faith regarding the disputes between the parties; and
- (f) Any and all other violations of duty or by Advanced Healthcare to Dr. Schultis as may be shown at the trial of this matter.

3. Dr. Schultis is entitled to and demands a trial by jury on all issues raised by the Original Complaint and by this Amended and Supplemental Complaint.

RESPECTFULLY SUBMITTED:



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT A COPY OF THIS DOCUMENT
HAS BEEN SERVED UPON COUNSEL OF RECORD BY CM/ECF
NOTIFICATION AND/OR BY FAX OR BY UNITED STATES
MAIL, PROPERLY ADDRESSED WITH POSTAGE PREPAID ON
THIS _____ DAY OF _____, 2010.